

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

In re:) Chapter 11
)
15375 MEMORIAL CORPORATION, <i>et al.</i> ,) Bankr. Case. No. 06-10859 (KG)
)
Debtors.) (Jointly Administered)
)
BEPCO L.P., f/k/a)
Bass Enterprises Production Company,)
Appellant,) Civil Action No. 08-313 (SLR)
)
v.) (Consolidation of civil actions 08-313,
) 314, 318, 319, 321, 322, 325 and 326)
15375 MEMORIAL CORPORATION, <i>et al.</i> ,)
)
Appellees and Cross-Appellants.)
)

**JOINDER OF APPELLEES AND CROSS-APPELLANTS 15375 MEMORIAL
CORPORATION AND SANTA FE MINERALS, INC. TO RESPONSE OF
GLOBALSANTAFE ENTITIES IN OPPOSITION TO BEPCO, L.P. F/K/A BASS
ENTERPRISES PRODUCTION COMPANY'S MOTION (I) FOR CONSIDERATION
OF SUPPLEMENTAL MATERIALS IN CONNECTION WITH CERTIFICATION
REQUEST AND (II) TO SUPPLEMENT RECORD ON APPEAL**

Debtors and Debtors in possession 15375 Memorial Corporation (“Memorial”) and Santa Fe Minerals, Inc. (“Santa Fe”) (collectively, “Debtors”), by their undersigned counsel, hereby joins the *RESPONSE OF GLOBALSANTAFE ENTITIES IN OPPOSITION TO BEPCO, L.P. F/K/A BASS ENTERPRISES PRODUCTION COMPANY'S MOTION (I) FOR CONSIDERATION OF SUPPLEMENTAL MATERIALS IN CONNECTION WITH CERTIFICATION REQUEST AND (II) TO SUPPLEMENT RECORD ON APPEAL* that was filed on June 19, 2008 (Docket No. 16).

WHEREFORE, Debtors respectfully request the entry of an Order denying the Motion to Supplement and request such other and further relief as this Court deems necessary and just.

Dated: June 23, 2008
Wilmington, Delaware

Respectfully submitted,
STEVENS & LEE, P.C.

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